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Attorneys for Debtors

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

In re: **MATTHEW NAZIR and KANWAL MATTHEW,** **Debtors.**	**Case No. 17-40503 WJL** **Chapter 13** **MOTION TO VALUE PERSONAL PROPERTY; NOTICE OF OPPORTUNITY FOR HEARING; DECLARATION IN SUPPORT; AND CERTIFICATE OF SERVICE**

PLEASE TAKE NOTICE that Debtors request the court value the collateral described below, which secures the claim of the Creditor Bank of Stockton. Debtors also request that the amount of the Creditor's secured claim not exceed the value of the collateral, less the claims of creditors holding senior liens or security interests. This determination shall supersede any greater claim demanded in a proof of claim. Any objections to the Creditor's claim are reserved.

NOTICE IS HEREBY GIVEN, pursuant to FRBP 3007 as modified by B.L.R. 9014-1 that any objection to the requested relief, or a request for hearing on the matter must be filed and served on the requesting party within twenty-one (21) days of mailing of the notice; 2) that a request for hearing or objection must be accompanied by any declarations or memoranda of law the party objecting or requesting wishes to present in support of its position; 3) that if there is not a timely objection to the requested relief or a request for hearing, the Court may enter an order granting the relief by default; and 4) that the initiating party will give at least seven (7) days written notice of hearing to the objecting or requesting party, and to any trustee or committee appointed in the case, in the event an objection or request for hearing is timely made.

MOTION

Debtor hereby moves to value the 2014 Toyota Camry at $7,600.00, limit Creditor's secured claim to $16,500.00, and that any amount in excess be treated as a general unsecured claim, pursuant to 11 U.S.C. §§ 506 and 1322 (b)(2), FRBP 3012 and 9014, and B.L.R. 9014-1, which determination shall become part of Debtor's confirmed Chapter 13 Plan.

Dated: March 31, 2017 /s/ Patrick L. Forte

PATRICK L. FORTE
Attorney for Debtors

DECLARATION

I declare under the penalty of perjury that the information listed below is true and correct:

1. I am one of the Debtors in the above-captioned case.

2. At the time I filed my Chapter 13 case, I was the owner of the 2012 Ford Explorer (the "collateral").

3. I am informed and believe that on the date I filed my case, the collateral was worth $16,500.00.

4. Bank of Stockton holds a claim of approximately $16,500.00, secured by the collateral.

Dated: March 31, 2017

/s/ Matthew Nazir
MATTHEW NAZIR

CERTIFICATE OF SERVICE

I am not less than 18 years of age and not a party to the within case. My business address is: 1624 Franklin Street, #911, Oakland, CA 94612.

I served this MOTION TO VALUE COLLATERAL; NOTICE OF OPPORTUNITY FOR HEARING; DECLARATION IN SUPPORT by first-class United States Mail, postage pre-paid, at Oakland, California, on the date noted below and addressed to the Claimant above, and on those listed below. If entitled to notice, the Chapter 13 Trustee will receive such notice upon the electronic filing of this document I declare, under penalty of perjury, that the foregoing is true and correct.

Attn: Officer
Bank of Stockton
301 East Miner Avenue
Stockton, CA 95202

Attn: Jonathan Klipfel
Bank of Stockton
415 E Miner Avenue
Stockton, CA 95202

Attn: officer
Bank of Stockton
PO Box 1110
Stockton, CA 95201

Dated: March 31, 2017

/s/ Joe P. Segura
JOE P. SEGURA